

Re: 1005 Shady Lane payoff request

ryan rouz <ryan@rouzlaw.com>

Tue 4/5/2022 9:08 AM

To: Michael Burns <Michael.Burns@padgettlawgroup.com>

Thank you.

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**From:** Michael Burns <Michael.Burns@padgettlawgroup.com>

**Sent:** Tuesday, April 5, 2022 8:55:01 AM

**To:** ryan rouz <ryan@rouzlaw.com>

**Subject:** RE: 1005 Shady Lane payoff request

Hi Ryan – confirmed that the wire has been received and accepted and the foreclosure sale has been cancelled.



**Michael John Burns, Esq.\***

*Managing Attorney - Litigation*

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\*Licensed in Texas

Escalation Contact: Evan Singer, Managing Attorney – Default at [Evan.Singer@Padgettlawgroup.com](mailto:Evan.Singer@Padgettlawgroup.com)

---

**From:** Michael Burns

**Sent:** Monday, April 4, 2022 4:18 PM

**To:** ryan rouz <ryan@rouzlaw.com>

**Subject:** RE: 1005 Shady Lane payoff request

Received, confirming.



**Michael John Burns, Esq.\***

*Managing Attorney - Litigation*

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Escalation Contact: Evan Singer, Managing Attorney – Default at [Evan.Singer@Padgettlawgroup.com](mailto:Evan.Singer@Padgettlawgroup.com)

---

**From:** ryan rouz <ryan@rouzlaw.com>

**Sent:** Monday, April 4, 2022 4:14 PM

**To:** Michael Burns <Michael.Burns@padgettlawgroup.com>

**Subject:** Re: 1005 Shady Lane payoff request

Michael,

I sent out a \$191,000 pay-off wire with excess funds per the instructions you had sent. I just confirmed with Chase the wire has hit. See proof of wire below.

Please confirm receipt of funds and confirm the trustee will pull the property from the auction. Also, let me know when I should expect the release of lien.

Thanks.

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**DOMESTIC WIRE TRANSFER VIA: NBH BANK/  
102102013 A/C: STATEBRIDGE COMPANY, LLC -...**

Pending

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**-\$191,000.00**



Wire Transfer Agreement - continued

(b) Prior to sending a Consumer International Wire Transfer, we will provide you with certain important disclosures regarding your transaction including, to the extent applicable: the amount that will be transferred to the beneficiary, the amount and description of any fees and taxes imposed by us, the total amount of the transaction, the exchange rate to be used if applicable, the amount of currency to be transferred, the amount and description of any fees imposed by intermediaries or our agents, and the amount that will be received by the beneficiary. In addition to the items above you will also be provided the date the funds are to be made available to the beneficiary, error resolution and cancellation right information and other disclosures. This will be provided either at the time you authorize the wire transfer or on a receipt provided after you've authorized your transaction.

(c) Except as otherwise agreed in writing, we are liable only for damages required to be paid as provided under Regulation E, subpart B or, to the extent applicable, UCC 4A. Except as required by Regulation E, subpart B, we will not be responsible for the acts or omissions of any other person or entity, including but not limited to any processor, any country's central bank, or any other financial institution, and no such person or entity will be deemed our agent. We will not be liable for the failure or delay of any wire transfer or for failing to meet other obligations in the Agreement because of circumstances or causes beyond our control, including governmental, legal or regulatory restrictions or prohibitions, third party actions, natural disasters, equipment or system failures, labor disputes, wars or riots. IN NO EVENT SHALL WE HAVE ANY LIABILITY FOR ANY INDIRECT, INCIDENTAL, CONSEQUENTIAL, PUNITIVE, OR SPECIAL DAMAGES, EVEN IF ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.

(d) You have the right to cancel Consumer International Wire Transfers at no cost to you within 30 minutes after you have authorized us to send it. Please refer to the disclosure we provided to you at the time you authorized the Consumer International Wire Transfer on how to cancel.

(e) If you think there has been an error or problem with your Consumer International Wire Transfer, call us at 1-888-434-3030, visit a Chase branch, or send an account inquiry via Secure Message Center on chase.com.

You must contact us within 180 days of the date we disclosed to you that funds would be made available to the recipient. When you do, please tell us:

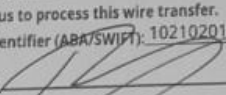
- Your name and address;
- The error or problem with the transfer, and why you believe it is an error or problem;
- The name of the recipient, and if you know it, their telephone number or address;
- The dollar amount of the transfer; or
- The confirmation code or number of the transaction

We will determine whether an error occurred within 90 days after you contact us and we will correct any error promptly. We will tell you the results within three business days after completing our investigation and will advise you of any remedies that may be available to you. If no response is received, we will refund your account for the applicable remedies. If we decide that there was no error, we will send you a written explanation. You may ask for copies of any documents we used in our investigation.

By providing your signature as authorization, you agree to these terms and conditions, that the wire transfer information in this document is accurate and you authorize us to process this wire transfer.

Recipient Bank's Identifier (ABA/SWIFT): 102102013

Recipient's Account Number: 2578665290

Sender's Signature: 

Date: 4/4/22

Email Address: ryah@rouzlaw.com

Transaction Number (Contact ID): 844747026050001

The Email Address and Transaction Number provided will be used for communication purposes.

## Wire Transfer Outgoing Request



## Wire Transfer Sender Information

Sender Name: RYAN ROUZ				
Account Name: ROUZ & ASSOCIATES, PLLC		Street Address: 1111 S AKARD ST UNIT 405		
City: DALLAS	State: TX	Zip: 75215-1020	Country: USA	Daytime Phone: 469-771-5491
Primary ID Type: Driver's License	ID Issuer: TX	ID Number: 22296861	ID Issue Date: 10/29/2019	ID Exp: 07/31/2025
Secondary ID Type: Chase or Bank Issued Credit/Debit Card	ID Issuer: Chase	ID Number: XXXXXXXXXXXX3404	ID Issue Date:	ID Exp: 08/31/2024
Comments:				

## Wire Transfer Information

Request Date: 04/04/2022	Request time: 04:10:47PM Eastern time	Effective date: 04/04/2022	Wire Type: Domestic
Debit Account #: XXXXX0796	Debit Account Type: BUS COMPLETE CHK	Wire Amount (US dollars): \$191,000.00	
Qualifying Account #:	Qualifying Account Type:	Source of funds: Checking	Wire Fee: \$35.00
Currency type to be sent: US Dollars	Exchange rate: N/A	Foreign currency amount: N/A	Amount to Collect (USD): \$191,035.00
FX Contract Number:			

## Recipient Account Information

Account Name: Statebridge Company, LLC - Payoffs			
Street Address:		Account Number: 2578665290	
	City:	State:	Zip: Country:
Text to Recipient: 0000039786, Kazem Daneshmandi and GRC D Home LLC, 1005 Shady Lane North, Keller, TX 76248			

## Receiving Bank Information

Bank Name: Community Banks of Colorado, A Division of NBH Bank			
Street Address: 3780 W 10th St		Bank ABA/SWIFT Code: 102102013	
	City: Greeley	State: CO	Zip: Country: 80634-1819 USA
Intermediary Bank Name:			
Street Address:		Intermediary Bank ABA:	
	City:	State:	Zip: Country:
Text to Receiving Bank:			

N15220-CS WTA (03/2022)

Page 1 of 5

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From: Michael Burns &lt;Michael.Burns@padgettlawgroup.com&gt;

Sent: Friday, April 1, 2022 4:37:33 PM

To: ryan rouz &lt;ryan@rouzlaw.com&gt;

Subject: RE: 1005 Shady Lane payoff request

Thank you for the notice Ryan. Dispute that your client is a consumer under the DTPA. The mortgagee will seek to recover all costs and fees incurred to defend against any baseless claims.



**Michael John Burns, Esq.\***

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Escalation Contact: Evan Singer, Managing Attorney – Default at [Evan.Singer@Padgettlawgroup.com](mailto:Evan.Singer@Padgettlawgroup.com)

---

**From:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>

**Sent:** Friday, April 1, 2022 4:10 PM

**To:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>

**Subject:** Re: 1005 Shady Lane payoff request

Hi Michael,

My client disputes the amount claimed by DBRR in the payoff statement. Your client is hereby put on notice of GRC's imminent DTPA claim. A formal DTPA notice is forthcoming.

Thank you.

<p>Rouz Law P.C. Attorney Ryan Rouz 1111 S. Akard St. Ste. 405 Dallas, TX 75215 Phone: 469-777-1451 Fax: 469-666-9291 <a href="http://www.sandersrouz.com">www.sandersrouz.com</a></p>	
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---

**From:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>

**Sent:** Thursday, March 31, 2022 7:41 AM

**To:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>

**Subject:** RE: 1005 Shady Lane payoff request

Hi Ryan – the beneficiary denies the request to cancel the foreclosure sale. It intends to proceed with the 04/05/2022 foreclosure sale as scheduled.

The requested payoff quote is attached. Thanks.



**Michael John Burns, Esq.\***

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Escalation Contact: Evan Singer, Managing Attorney – Default at [Evan.Singer@Padgettlawgroup.com](mailto:Evan.Singer@Padgettlawgroup.com)

---

**From:** Michael Burns

**Sent:** Monday, March 28, 2022 5:47 PM

**To:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>

**Subject:** RE: 1005 Shady Lane payoff request

Not yet Ryan. Following up now.



**Michael John Burns, Esq.\***

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Escalation Contact: Evan Singer, Managing Attorney – Default at [Evan.Singer@Padgettlawgroup.com](mailto:Evan.Singer@Padgettlawgroup.com)

---

**From:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>

**Sent:** Monday, March 28, 2022 1:25 PM

**To:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>

**Subject:** Re: 1005 Shady Lane payoff request

Hi Michael,

Any word from your client on this?

Thank you

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**From:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>  
**Sent:** Friday, March 25, 2022 2:57:17 PM  
**To:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>  
**Subject:** RE: 1005 Shady Lane payoff request

Just tried. Let me know when you're back. I'm at 713.446.1707.



**Michael John Burns, Esq.\***  
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Escalation Contact: Evan Singer, Managing Attorney – Default at [Evan.Singer@Padgettlawgroup.com](mailto:Evan.Singer@Padgettlawgroup.com)

---

**From:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>  
**Sent:** Friday, March 25, 2022 2:50 PM  
**To:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>  
**Subject:** Re: 1005 Shady Lane payoff request

Hi Michael,

Let me know if you're free for a call today so we can try to get this matter settled.

Thank you

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---

**From:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>  
**Sent:** Wednesday, March 23, 2022 6:22 PM  
**To:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>  
**Subject:** RE: 1005 Shady Lane payoff request

Just tried to ring. Let me know when you're around.



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Escalation Contact: Evan Singer, Managing Attorney – Default at [Evan.Singer@Padgettlawgroup.com](mailto:Evan.Singer@Padgettlawgroup.com)

---

**From:** Michael Burns  
**Sent:** Wednesday, March 23, 2022 3:31 PM  
**To:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>  
**Subject:** RE: 1005 Shady Lane payoff request

A call makes sense to make sure we're petting the same dog here. My read of the message below is that your client will move to convert to Chapter 7 for the sole purpose of attempting to invoke the automatic stay/enjoin the sale, I read that to mean there is no intent to pay the lien.

I've got time after 5 today, and can clear time tomorrow if needed.



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---

**From:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>  
**Sent:** Wednesday, March 23, 2022 3:28 PM  
**To:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>  
**Subject:** Re: 1005 Shady Lane payoff request

When did my client make it clear that it intends to delay the foreclosure? I sent this to you yesterday, "Please let me know if you'd like to schedule a conference call sometime this week to discuss a potential resolution to this matter." My client is working on multiple ways to resolve this matter - including a payoff, which is why I submitted a payoff request.

I am expecting the payoff amount by April 1, 2022.

---

Rouz Law P.C.  
Attorney Ryan Rouz  
1111 S. Akard St. Ste. 405  
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Fax: 469-666-9291  
[www.sandersrouz.com](http://www.sandersrouz.com)



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---

**From:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>  
**Sent:** Wednesday, March 23, 2022 3:18 PM  
**To:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>; Gregory Mitchell <[gmitchell@freemanlaw.com](mailto:gmitchell@freemanlaw.com)>  
**Subject:** RE: 1005 Shady Lane payoff request

Thanks for the detail. I disagree. Your client has made clear that it intends to delay foreclosure, not make payment.



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---

**From:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>  
**Sent:** Wednesday, March 23, 2022 3:16 PM  
**To:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>; Gregory Mitchell <[gmitchell@freemanlaw.com](mailto:gmitchell@freemanlaw.com)>  
**Subject:** Re: 1005 Shady Lane payoff request

At this point my client is weighing its options. GRC needs the payoff amount so it's counsel can properly advise it. Regardless, you do not have discretion to ignore a payoff request. Try it - your client will be sued if we do not get a payoff statement.

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---

**From:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>  
**Sent:** Wednesday, March 23, 2022 3:09 PM  
**To:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>; Gregory Mitchell <[gmitchell@freemanlaw.com](mailto:gmitchell@freemanlaw.com)>  
**Subject:** RE: 1005 Shady Lane payoff request

For what purpose does it need a payoff? Does it intend to payoff or attempt to convert to Chapter 7?



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Escalation Contact: Evan Singer, Managing Attorney – Default at [Evan.Singer@Padgettlawgroup.com](mailto:Evan.Singer@Padgettlawgroup.com)

---

**From:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>  
**Sent:** Wednesday, March 23, 2022 3:08 PM  
**To:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>; Gregory Mitchell <[gmitchell@freemanlaw.com](mailto:gmitchell@freemanlaw.com)>  
**Subject:** Re: 1005 Shady Lane payoff request

What are you talking about? How are you not going to give us a payoff amount? My client needs the payoff amount. The deadline remains.

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**From:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>  
**Sent:** Wednesday, March 23, 2022 3:05:10 PM  
**To:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>; Gregory Mitchell <[gmitchell@freemanlaw.com](mailto:gmitchell@freemanlaw.com)>  
**Subject:** RE: 1005 Shady Lane payoff request

Hi Ryan, received. GRC has no ability or basis to convert to Chapter 7. Any attempt to do so is pretextual. Regardless, and with the facts before us, a conversion to Chapter 7 (even if allowed) would not reimpose the 362 stay. DB RR, LLC intends to proceed with foreclosure as scheduled. Since GRC has no good faith intent to pay off the lien (as is made apparent in this message) DB RR, LLC will not be providing payoff information. For conference purposes, DB RR, LLC opposes any motion to convert on the grounds that such action is dilatory and there is no fact or law to support it.

Thanks.



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**From:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>  
**Sent:** Tuesday, March 22, 2022 6:28 PM  
**To:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>; Gregory Mitchell <[gmitchell@freemanlaw.com](mailto:gmitchell@freemanlaw.com)>  
**Subject:** Re: 1005 Shady Lane payoff request

Hi Michael,

I've just had a meeting with GRC's rep and Mr. Mitchell, GRC's BK attorney.

GRC was about to file a motion to sell - but this move by your client to foreclose on the property made GRC change its plan of action. For this reason, my client has to convert to Chapter 7 to keep this property out of foreclosure for the best interest of GRC's Creditors.

This move will put the automatic stay back into effect - thereby keeping the property out of foreclosure for close to 6 months. Then the trustee will take control over GRC's estate.

My client can then motion the Court to convert back to Chapter 11 and file the motion to sell. This will put your client right back into the position it was a month ago.

Unless we are able to enter into some kind of agreement before March 25, 2022, GRC is going to convert to Ch. 7. Please let me know if you'd like to schedule a conference call sometime this week to discuss a potential resolution to this matter.

Thank you.

Rouz Law P.C.  
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1111 S. Akard St. Ste. 405  
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Phone: 469-777-1451  
Fax: 469-666-9291  
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**From:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>  
**Sent:** Tuesday, March 22, 2022 3:27 PM  
**To:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>  
**Subject:** RE: 1005 Shady Lane payoff request

Additional material attached Ryan.



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**From:** Michael Burns  
**Sent:** Tuesday, March 22, 2022 2:50 PM  
**To:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>  
**Subject:** RE: 1005 Shady Lane payoff request

Hi Ryan – received and forwarded payoff request for processing. DOT attached. Thanks.



**Michael John Burns, Esq.\***  
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**From:** ryan rouz <[ryan@rouzlaw.com](mailto:ryan@rouzlaw.com)>  
**Sent:** Tuesday, March 22, 2022 2:08 PM  
**To:** Michael Burns <[Michael.Burns@padgettlawgroup.com](mailto:Michael.Burns@padgettlawgroup.com)>  
**Subject:** 1005 Shady Lane payoff request  
**Importance:** High

Hi Michael,

Please see the attached payoff request. I've also sent a copy of the payoff request through via first class mail.

Are you also able to provide me with a copy of the Loan Agreement for this property?

Thank you.

Rouz Law P.C.  
Attorney Ryan Rouz  
1111 S. Akard St. Ste. 405  
Dallas, TX 75215  
Phone: 469-777-1451  
Fax: 469-666-9291  
[www.sandersrouz.com](http://www.sandersrouz.com)



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